



24096 – 170th Avenue
 Fergus Falls, MN 56537
 Phone: 218-998-4301
 Fax: 218-998-4302
 Email: info@otae.com
 Website: www.ottertail ethanol.com

Sarah Kilgriff
Minnesota Pollution Control
Compliance and Enforcement Section

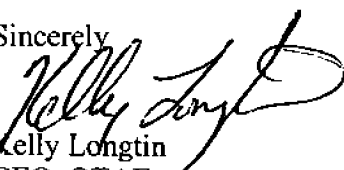
This letter is to address the three deviation groups that were reported to the state in our last deviation report. These three deviations were incorrect water flow on our CO₂ scrubber and incorrect pressure drop on both the CO₂ scrubber and the Vent Gas scrubber.

The incorrect water flow the CO₂ scrubber deviations were caused by misinterpreting the permit requirements and also operator error. OTAE believed that during compliance checking we had flexibility in our water flow requirements. This was a misinterpretation on OTAE's part and was resolved immediately after discovering the problem. Some of the deviations were from operator error by changing the water flow set points in the plants control system. This problem has also been corrected with a two part approach. Part one was additional employee training for those operators who were involved with the deviations. Part 2 was adding the permit limits to the daily environmental compliance log that each shift supervisor fills out. All minimum and maximum permit requirements are listed on this log so operators can report problems immediately to management.


The balance of the deviations pertained to the pressure drop requirements on both the CO₂ scrubber and Vent Gas Scrubber. These were caused by inaccurate gauges installed on both units. OTAE is still diligently working to correct this problem by installing different gauges and also changing the piping to each gauge. This deviation is still a challenge to OTAE but the situation is significantly improved. OTAE would like to stress that these deviations were due to inaccurate measurements taken from the process not actual high pressure drops. For this installation if the pressure drops were as high as listed then the process would be venting directly to atmosphere bypassing the scrubbers. At no time was the process bypassing the scrubbers or any other pollution control equipment.

As stated earlier OTAE has made several changes to correct its instrumentation and operator error problems. We feel at this time that our issues have been resolved our next deviation report will reflect these changes.

Sincerely,


 Kelly Longtin
 CEO, OTAE

8-20-08


 B. Gunner Greene
 Plant Manager, OTAE

COPY



Minnesota Pollution
Control Agency

520 Lafayette Road North
St. Paul, MN 55155-4194

Excess Emissions Reporting Form

DRF-1

Continuous Monitoring Systems Reporting Form

Please note: This form has been updated. Please print, complete and remit only the forms. Please see the instructions to ensure proper use and understanding of definitions. **DO NOT** print and return the instructions.

Use this form to record and report excess emissions (EE) that are identified by *Continuous Monitoring Systems*. This includes Continuous Emission Monitoring Systems (CEMS) and Continuous Opacity Monitoring Systems (COMS). DRF-1 is the form you must use to report excess emissions from a stack as recorded by your facility's Continuous Emission Monitoring Systems (CEMS) and Continuous Opacity Monitoring Systems (COMS).

Address hard copy report submittals to: Compliance Tracking Coordinator, Fourth Floor
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

1) General Facility Information

Company name: Otter Tail Ag Enterprises, LLC

AQ file no.: 4297 AQ permit no.: 111000777-001

Report covers Quarter: Jan-June Year: 2008

2) CEMS/COMS Data Summary Table

| | | | | Duration of Monitor Downtime | | Duration of Excess Emissions (EE) | | | |
|--------------------------|-----------------------------|------------------------|-----------------------------------|-------------------------------------------|--------------------------|-----------------------------------------|---------------------------|--------------------------------------------|--------------------------|
| 2a) Monitor ID Number | 2b) Monitor ID Pollutant | 2c) EU/SV ID Number | 2d) Total Operating Time (TOT) | 3i) Total Duration of Monitor Downtime | 2e) Downtime % of TOT | 4i) Cumulative Duration of Exempt EE | 2f) Exempt EE % of TOT | 4m) Cumulative Total Duration of All EE | 2g) Total EE % of TOT |
| CE030 | VOC | E4050 | 2601hrs | 0 | 0 | 0 | 0 | 0 | 0 |
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4) Duration of Excess Emissions: Provide the following information regarding each individual excess emission identified by a monitor. Make a separate table for each monitor, as needed

| 4a) Emission Unit ID Number | 4b) Monitor ID Number | 4c) Pollutant or Parameter Monitored | 4d) Beginning Date and Time of EE | 4e) End Date and Time of EE | 4f) Limit and Averaging Period | 4g) Highest Reading of EE with Units (i.e. 5, Lb/Hr, Etc) | 4h) Duration of Exempt EE (include these entries as part of 4i) | 4i) Total Duration of All EE | 4j) Cause of EE (clarifying comments) | 4k) Corrective Action Taken (Clarifying Comments) | 4m) Cumulative Total Duration of All Excess Emissions |
|--------------------------------------|--------------------------------|--------------------------------------------------|-----------------------------------------------|--------------------------------------------|-----------------------------------------|-----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|------------------------------------------|---------------------------------------------|---------------------------------------------------------|-------------------------------------------------------|
| CE030 | CE030 | VOC | --- | --- | --- | --- | --- | --- | --- | --- | --- |
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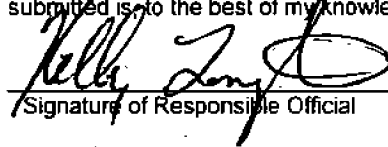
5) Monitor Bypasses: Provide the following information for each period in which an emission unit is operating but is not being monitored because emissions were either partially or totally diverted around the monitoring system See Minn. R. 7017.1110 subp. 2c

| 5a) Monitor Id Number | 5b) Emission Unit Required to be Monitored | 5c) Pollutant and Limit Required to be Monitored | 5d) Beginning Date And Time Of Bypass Period | 5e) End Date and Time of Bypass Period | 5f) Duration of Monitor Bypass (Minutes) | 5g) Was P.C.E. Operating During Bypass Period? | 5h) Duration of Allowable Monitor Bypass | 5i) Reason for Monitor Bypass (clarifying comments) | 5j) Corrective Action Taken (clarifying comments) |
|--------------------------------|-----------------------------------------------------------|-----------------------------------------------------------------|-------------------------------------------------------------|----------------------------------------------------|------------------------------------------------------|------------------------------------------------------------------|------------------------------------------------------|-----------------------------------------------------------|---------------------------------------------------------|
| CE030 | EMP | VOC | --- | --- | 0 | --- | --- | --- | --- |
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5k) Total Duration of Allowable Monitor Bypass:

6) CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.



Signature of Responsible Official

KELLY LONGTIN

Printed Name of Responsible Official

CEO

Title

8-20-08

Date

Please note: The individual signing must meet the definition of "responsible official" in Minn. R. 7007.0100, subp. 21.



Minnesota Pollution
Control Agency

Air Quality
520 Lafayette Road
St. Paul, MN 55155-4194

Deviation Reporting Form DRF-2

Deviations Identified by Periodic Monitoring Systems or
Through Recordkeeping
11/28/2006

General Information about Deviation and Compliance Reporting

If your permit requires you to submit deviation reports or an annual compliance certification, you should use the *Deviation Reporting Forms* (DRFs) and Annual Compliance Certification Report, unless you get MPCA approval to use another format or your facility's permit specifies otherwise. There are two separate DRF forms: DRF-1 and DRF-2.

Use **DRF-1** to report deviations recorded by your facility's continuous monitoring systems (CMS), which include continuous emission monitoring systems (CEMS), continuous opacity monitoring systems (COMS), and any other monitoring system where data is recorded continuously (e.g., using a strip chart recorder or a computer). If you are a permittee with a CEMS or COMS, notice that DRF-1 is basically the same as the Excess Emissions Report (EER) that you have submitted to the MPCA in the past. Since DRF-1 and EER are basically the same, you may continue to submit Excess Emissions Reports in place of DRF-1.

Use **DRF-2** to report deviations recorded by periodic monitoring systems or deviations identified through recordkeeping (e.g., fuel use records). Periodic monitoring systems are systems in which the data collected is *not* recorded continuously (e.g., a temperature monitor where the data is recorded manually or recorded every 15 minutes).

Use **Annual Compliance Certification Report** form to report your compliance status at end of each year if required by your permit.

General Facility Information

Facility name: Offet Tail Air Enterprises, LLC AQ facility ID: 4297

Time period covered by report: ☒ January 1-June 30 ☐ July 1-December 31 2008 (year)

Description of Deviations: Provide the following information regarding each individual deviation identified by a periodic monitoring system. Be sure to report any deviations which occurred during monitor downtime or monitor bypasses. Use the same numbering system as used in the facility permit.

| Date of deviation | Emission unit ID no. | Monitor ID no. | Cite permit condition which was deviated from | Detailed description of deviation, why it occurred, and corrective action taken |
|-------------------|----------------------|----------------|-----------------------------------------------|---------------------------------------------------------------------------------|
| 3/14/08 | CE027 | SV026 | water flow | misunderstanding of permit requirements |
| 3/16-17/08 | " | " | " | -will increase employee training |
| 3/19-4/20/08 | " | " | " | to remedy water flow specifications |
| 4/22-28/08 | " | " | " | |
| 5/2/08 | " | " | " | |
| 5/6/08 | " | " | " | |

Description of Monitor Downtime: Provide the following information regarding each period when a periodic monitoring system did not record required data. Use the same numbering system as used in facility permit.

| Date and time of missed record | Monitor ID no. | Emission unit ID no. | Pollutant or parameter monitored | Cause of the monitor downtime and corrective action taken |
|--------------------------------|----------------|----------------------|----------------------------------|-----------------------------------------------------------|
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Use **Annual Compliance Certification Report** form to report your compliance status at end of each year if required by your permit.

General Facility Information

Facility name: OTAE AQ facility ID: 4297

Time period covered by report: ☒ January 1-June 30 ☐ July 1-December 31 2008 (year)

Description of Deviations: Provide the following information regarding each individual deviation identified by a periodic monitoring system. Be sure to report any deviations which occurred during monitor downtime or monitor bypasses. Use the same numbering system as used in the facility permit.

| Date of deviation | Emission unit ID no. | Monitor ID no. | Cite permit condition which was deviated from | Detailed description of deviation, why it occurred, and corrective action taken |
|-------------------|----------------------|----------------|-----------------------------------------------|---------------------------------------------------------------------------------|
| 5/8-10/08 | CE027 | SV026 | water flow | |
| 5/13-15/08 | " | " | " | |
| 5/17/08 | " | " | " | |
| 5/19/08 | " | " | " | |
| 5/24-26/08 | " | " | " | |
| 5/28/08 | " | " | " | |

Description of Monitor Downtime: Provide the following information regarding each period when a periodic monitoring system did not record required data. Use the same numbering system as used in facility permit.

| Date and time of missed record | Monitor ID no. | Emission unit ID no. | Pollutant or parameter monitored | Cause of the monitor downtime and corrective action taken |
|--------------------------------|----------------|----------------------|----------------------------------|-----------------------------------------------------------|
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General Facility Information

Facility name: OTAE AQ facility ID: 4297

Time period covered by report: ☒ January 1-June 30 ☐ July 1-December 31 2008 (year)

Description of Deviations: Provide the following information regarding each individual deviation identified by a periodic monitoring system. Be sure to report any deviations which occurred during monitor downtime or monitor bypasses. Use the same numbering system as used in the facility permit.

| Date of deviation | Emission unit ID no. | Monitor ID no. | Cite permit condition which was deviated from | Detailed description of deviation, why it occurred, and corrective action taken |
|-------------------|----------------------|----------------|-----------------------------------------------|---------------------------------------------------------------------------------|
| 6/6/08 | CE027 | SV026 | water flow | |
| 6/19/08 | " | " | " | |
| 6/26-28/08 | " | " | " | |
| 3/10-12/08 | " | " | pressure drop | Plant is having trouble accurately |
| 3/14/08 | " | " | " | maintaining pressure drop - the |
| 3/16/08 | " | " | " | facility will either recalibrate |

Description of Monitor Downtime: Provide the following information regarding each period when a periodic monitoring system did not record required data. Use the same numbering system as used in facility permit.

| Date and time of missed record | Monitor ID no. | Emission unit ID no. | Pollutant or parameter monitored | Cause of the monitor downtime and corrective action taken |
|--------------------------------|----------------|----------------------|----------------------------------|-----------------------------------------------------------|
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Use **Annual Compliance Certification Report** form to report your compliance status at end of each year if required by your permit.

General Facility Information

Facility name: OTAE AQ facility ID: 4297

Time period covered by report: ☒ January 1-June 30 ☐ July 1-December 31 2008 (year)

Description of Deviations: Provide the following information regarding each individual deviation identified by a periodic monitoring system. Be sure to report any deviations which occurred during monitor downtime or monitor bypasses. Use the same numbering system as used in the facility permit.

| Date of deviation | Emission unit ID no. | Monitor ID no. | Cite permit condition which was deviated from | Detailed description of deviation, why it occurred, and corrective action taken |
|-------------------|----------------------|----------------|-----------------------------------------------|---------------------------------------------------------------------------------|
| 3/19/08 | LE 027 | SV026 | pressure drop | meters or replace if necessary. |
| 3/21-4/24/08 | " | " | " | |
| 5/1-2/08 | " | " | " | |
| 5/4-29/08 | " | " | " | |
| 5/31-6/1/08 | " | " | " | |
| 6/24-30/08 | " | " | " | |

Description of Monitor Downtime: Provide the following information regarding each period when a periodic monitoring system did not record required data. Use the same numbering system as used in facility permit.

| Date and time of missed record | Monitor ID no. | Emission unit ID no. | Pollutant or parameter monitored | Cause of the monitor downtime and corrective action taken |
|--------------------------------|----------------|----------------------|----------------------------------|-----------------------------------------------------------|
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Use **Annual Compliance Certification Report** form to report your compliance status at end of each year if required by your permit.

General Facility Information

Facility name: OTAE AQ facility ID: 4297

Time period covered by report: ☒ January 1-June 30 ☐ July 1-December 31 2008 (year)

Description of Deviations: Provide the following information regarding each individual deviation identified by a periodic monitoring system. Be sure to report any deviations which occurred during monitor downtime or monitor bypasses. Use the same numbering system as used in the facility permit.

| Date of deviation | Emission unit ID no. | Monitor ID no. | Cite permit condition which was deviated from | Detailed description of deviation, why it occurred, and corrective action taken |
|-------------------|----------------------|----------------|-----------------------------------------------|---------------------------------------------------------------------------------|
| 3/10-13/08 | CE028 | SV027 | Pressure Drop | |
| 3/14/08 | " | " | " | |
| 3/16/08 | " | " | " | |
| 3/19/08 | " | " | " | |
| 3/21-5/5/08 | " | " | " | |
| 5/1-14/08 | " | " | " | |

Description of Monitor Downtime: Provide the following information regarding each period when a periodic monitoring system did not record required data. Use the same numbering system as used in facility permit.

| Date and time of missed record | Monitor ID no. | Emission unit ID no. | Pollutant or parameter monitored | Cause of the monitor downtime and corrective action taken |
|--------------------------------|----------------|----------------------|----------------------------------|-----------------------------------------------------------|
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Use **Annual Compliance Certification Report** form to report your compliance status at end of each year if required by your permit.

General Facility Information

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Time period covered by report: ☒ January 1-June 30 ☐ July 1-December 31 2008 (year)

Description of Deviations: Provide the following information regarding each individual deviation identified by a periodic monitoring system. Be sure to report any deviations which occurred during monitor downtime or monitor bypasses. Use the same numbering system as used in the facility permit.

| Date of deviation | Emission unit ID no. | Monitor ID no. | Cite permit condition which was deviated from | Detailed description of deviation, why it occurred, and corrective action taken |
|-------------------|----------------------|----------------|-----------------------------------------------|---------------------------------------------------------------------------------|
| 5/16-17/08 | CE028 | SV027 | Pressure Drop | |
| 5/19-23/08 | " | " | " | |
| 5/25-27/08 | " | " | " | |
| 5/30/08 | " | " | " | |
| 6/1-2/08 | " | " | " | |
| 6/4-6/08 | " | " | " | |

Description of Monitor Downtime: Provide the following information regarding each period when a periodic monitoring system did not record required data. Use the same numbering system as used in facility permit.

| Date and time of missed record | Monitor ID no. | Emission unit ID no. | Pollutant or parameter monitored | Cause of the monitor downtime and corrective action taken |
|--------------------------------|----------------|----------------------|----------------------------------|-----------------------------------------------------------|
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| Date of deviation | Emission unit ID no. | Monitor ID no. | Cite permit condition which was deviated from | Detailed description of deviation, why it occurred, and corrective action taken |
|-------------------|----------------------|----------------|-----------------------------------------------|---------------------------------------------------------------------------------|
| 6/19-17/08 | CE028 | SV027 | Pressure Drop | |
| 6/19-21/08 | " | " | " | |
| 6/24-25/08 | " | " | " | |
| 6/27/08 | " | " | " | |
| 6/30/08 | " | " | " | |

Description of Monitor Downtime: Provide the following information regarding each period when a periodic monitoring system did not record required data. Use the same numbering system as used in facility permit.

| Date and time of missed record | Monitor ID no. | Emission unit ID no. | Pollutant or parameter monitored | Cause of the monitor downtime and corrective action taken |
|--------------------------------|----------------|----------------------|----------------------------------|-----------------------------------------------------------|
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Summary of Deviations and Monitor Downtime: Fill out a separate row of the table for each periodic monitoring system.

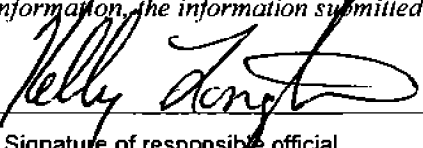
| Monitor ID no. (Use same number from facility permit.) | Total number of readings taken (during period covered by report) | Total number of readings indicating deviations | Percent of readings indicating deviations (To calculate, divide total number of readings taken that indicate deviations by the total number of readings. Multiply that number by 100.) | Total no. of readings missed (Indicate the number of times that data was not recorded as required by your permit.) | Total percentage of readings missed (Divide number of readings missed during reporting period by number of readings required during same period. Then multiply by 100.) |
|-----------------------------------------------------------|---------------------------------------------------------------------|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SV026 | 113 | 64 | 57% | 0 | 0 |
| SV026 | 113 | 104 | 92% | 0 | 0 |
| SV027 | 113 | 2 | 2% | 0 | 0 |
| SV027 | 113 | 94 | 83% | 0 | 0 |
| | | | | | |
| | | | | | |

Deviations Discovered Through Recordkeeping: List each deviation that was discovered through recordkeeping (e.g. your fuel use records indicate that you exceeded your fuel use limits). Provide at least the date(s) of each deviation; magnitude of deviation; associated emission unit, the cause of each deviation, and the corrective action taken.

1. _____
2. _____
3. _____

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.


 Signature of responsible official
 CEO
 Title

KELLY LONGTIN
 Printed name of person signing
 8-20-08
 Date

Note: The individual signing must meet the definition of "responsible official" in Minn. Rules 7007.0100, subp. 21.

Due dates:

| | | |
|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------|----------------------|
| Air Emission Permit – Option D, where control equipment is used to reduce actual reported emissions | Deviation Report – if a deviation occurred | January 30 & July 30 |
| Air Emission Permit – State or Federal Total Facility or General | Deviation Report – whether or not a deviation occurred | January 30 & July 30 |
| | Compliance Certification | January 31 |

Mail to: Air Quality Compliance Tracking Coordinator
 Minnesota Pollution Control Agency
 520 Lafayette Road North
 St. Paul, MN 55155-4194